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Subject: Draft Title V permit for Carmeuse Stone and Lime - Rockwell Operation
Date: Thursday, October 7, 2021 1:40:00 PM

Hi Hanna -

I have reviewed the draft Title V permit renewal (469033730-P20) for Carmeuse Stone and Lime – Rockwell Operation, and I have the following comments on the permit record (PD) and the draft permit:

1. There are several footnotes in the PD (pp. 16, 19, 21, 22, 24, etc.,) which state: “Pursuant to WDNR’s “Guidance for Including PM2.5 in Air Pollution Control Permit Application” dated February 22, 2016, PM2.5 emissions from low temperature processes do not produce PM2.5 emissions.” It was EPA R5’s understanding that such statements were no longer going to be included in the PD or permit, and would be replaced with the following general statement instead (which is included in this PD): “As required by 40 CFR s. 70.5(c)(3)i, emission estimates sufficient to verify which requirements are applicable to the source are included in this analysis. Bases on the definition in ss. NR 400.02(123m) and (124), Wis. Adm. Code, direct PM2.5 emissions cannot exceed PM10 emissions. Since PM10 and PM2.5 have the same major source thresholds, emission estimates of PM10 are sufficient for determining Part 70 and PSD source status with respect to both PM2.5 and PM10.”
2. In the draft permit (on p. 10), for the SO2 conditions for P36, permit condition I.A.2.b.(3) states, “To demonstrate compliance with I.A.1.a.(3)...” However, I.A.1.a.(3) is a PM limit. Should the citation be to I.A.2.a.(3) instead? Same question for the SO2 conditions for P33 on p. 19 of the draft permit.
3. In the draft permit (on p.11), condition I.A.3.b.(1) provides that “The instrumentation shall be available and in use a minimum of 85% of the time Process P36 is operated.” Is there a condition in I.A.3.c. or elsewhere in the permit to ensure and track that the instrumentation is being used at least 85% of the time?
4. For condition I.E.1.b.(1) in the draft permit, should there be a requirement to operate the filters (for S24, S30 and S65, and the baghouse for S10) at all times the units are operating in order to assure compliance with the permit limits? (These permit limits are the PTEs that were calculated in the PD based on the control devices operating at a specific control efficiency.)

Thank you for considering these comments. Please feel free to contact me at any time.

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